

EXHIBIT 1

CAUSE NO. 2017-76204

SUE ANN LOPEZ,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
IPFS CORPORATION,	§	
	§	
Defendant.	§	152ND JUDICIAL DISTRICT

DEFENDANT IPFS CORPORATION'S ORIGINAL ANSWER

Subject to and without waiving its previously-filed Motion to Dismiss Based on Forum Selectin Clause and, in the Alternative, Plea in Abatement and Motion to Compel Arbitration, Defendant IPFS Corporation files this original answer to Plaintiff's Original Petition for Declaratory Relief and respectfully shows as follows:

1. Subject to all stipulations and admissions that may hereinafter be made, as is authorized by Rule 92 of the Texas Rules of Civil Procedure, Defendant IPFS Corporation asserts a general denial to the Plaintiff's Original Petition for Declaratory Relief and respectfully requests that Plaintiff be required to prove the charges and allegations against it by a preponderance of the evidence as required by the Constitution and laws of the State of Texas.

2. The Court should dismiss the Plaintiff's claims based on the parties' contractual forum selection clause.

3. Alternatively, the Court should abate this case and compel arbitration.

WHEREFORE, Defendant IPFS prays for a take nothing judgment, for all costs, and for all other relief, including reasonable and necessary attorneys' fees and costs pursuant to Section 37.009 of the Texas Civil Practice and Remedies Code, to which it is entitled.

Respectfully submitted,

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By: _____

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CERTIFICATE OF SERVICE

This document was served in compliance with Rules 21 and 21a of the Texas Rules of Civil Procedure on the day of December 22, 2017.

A handwritten signature in black ink, appearing to read 'David W. Jones', is written over a horizontal line.

David W. Jones